

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

NATIONAL BOARD OF MEDICAL EXAMINERS *et al.*,  
 Plaintiffs,  
 v.  
 OPTIMA UNIVERSITY LLC *et al.*,  
 Defendants.

Civil Action No. 09-1043-JDB

## PLAINTIFFS' NOTICE REGARDING COSTS AND ATTORNEY'S FEES

1. In its Order Granting Plaintiffs’ Motion for Summary Judgment (Sept. 29, 2011) (D.E. 64) (the “Order”), the Court awarded Plaintiffs their “costs, including attorney’s fees,” and directed Plaintiffs to submit proof of those costs and attorney’s fees “within (30) days of the entry of this order.” Order at 21. The Plaintiffs are filing this notice in response to the Court’s directive.

2. As set forth in the attached Declaration of Robert A. Burgoyne, Plaintiffs have incurred and been billed for the following fees and expenses in connection with this lawsuit:

Attorney's Fees (Fulbright & Jaworski):	\$240,285.00
Costs (including fees of Rainey, Kizer, Reviere & Bell)	<u>\$ 35,364.89</u>
<b>Total Invoiced Fees &amp; Costs:</b>	<b>\$275,649.89</b>

WHEREFORE, Plaintiffs respectfully request that the Court enter an order awarding Plaintiffs **\$275,649.89** in attorneys' fees and costs, to be paid jointly and severally by Defendants Optima University LLC and Eihab Suliman.

October 28, 2011

Respectfully submitted,

/s/ Russell E. Reviere

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